REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested. Claims 1-33 are pending, Claims 1, 5, 7 and 8 having been amended and Claims 10-33 added by way of the present amendment. No new matter is added.

In the outstanding Office Action Claims 1-9 were rejected as being unpatentable over Callahan (U.S. Patent Publication 2002/0157023) in view of Sheynblat (U.S. Patent No. 6,677,894) and Nussbaum (U.S. Patent No. 6,779,154).

As a preliminary matter dependent Claims 10-33 are added by way of the present amendment. Claims 10-13 depend from Claim 1, Claims 14-17 depend from Claim 5, Claims 18-21 depend from Claim 6, Claims 22-25 depend from Claim 7, Claims 26-29 depend from Claim 8, and Claims 30-33 depend from Claim 9. Each of the sets of dependent claims contains similar subject matter, although drafted to correspond with the statutory class of invention from the independent claim from which it depends. No new matter is added.

Claims 1, 5 and 6 have been amended to include features that define the extraction f evaluation objects of the conditions included in the distribution rules from the distribution rule information. Dependent Claim 10, for example, further defines that the structured documents in which information regarding the contents, is described in each object. Thus, it should be clear that one feature of the invention of Claim 10 is that there is an access control in each object. Furthermore, the conversion rule information in which a conversion rule is described is generated on the basis of distribution rule information and situation information. In this way, a structured document may be described in an object (e.g., image scene) and the structured document may include information regarding contents corresponding to that object such as the start time and duration of the object, keyword showing the contents thereof, viewpoint thereof, value thereof (see, e.g., paragraph [0050]). This nonlimiting example has

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been provided for the Office's convenience in understanding support for Claim 10 as well as corresponding Claims 14, 18, 22, 26 and 30.

Dependent Claim 11 clarifies that conversion is performed by judging from information of the structured documents described in each object whether an access control is performable to convert or select the accessible object. (see, Fig. 10, steps S14-S17) This judgment is done on the basis of the conversion rule information that is generated. One aspect of this feature is that it allows structured documents to be converged on the basis of the conversion rule information, which corresponds to a change or selection of accessible objects.[1] Claims 15, 19, 23, 27 and 31 have been similarly added.

Claim 12 clarifies that the judgment of access control is performed on the basis of keywords or values (see, e.g., page 17, lines 10-23). New Claims 16, 20, 24, 28 and 32 have been similarly added.

Claims 13, 17, 21, 25, 29 and 33 include the corresponding features of the three dependent preceding claims. Thus, for example, the content of Claim 13 includes each of the features of Claims 10, 11 and 12. The same, respectively, corresponds for Claims 17, 21, 25, 29 and 33.

Applicants respectfully traverse the rejection. The present prior art rejection is essentially the same as that laid out in paragraph 5 of the Office Action mailed October 13, 2006, however a third reference, namely Nussbaum has been added to cure the deficiencies in Callahan and Sheynblat, which the Office Action recognizes fail to teach converting a structured document directly into another structured document such as converting an XML document directly into an HTML document.

The outstanding Office Action asserts that it would have been obvious to combine Sheynblat and Nussbaum with Callahan for the benefit of allowing the inclusion of targeted

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[1] This is intended to distinguish the format conversion as disclosed in Nussbaum.

marketing, billing, etc. based on a customer's location, and preserving the original structured document such that the new document may be easily converted back for future analysis to obtain the invention as claimed. Moreover, the Office Action asserts that "the motivation for doing so [to add direct conversion from Nussbaum into Callahan] would have been to preserve the original structured document such that the new document may be easily converted back for future analysis."

Applicants incorporate by reference all of the remarks filed in the Amendment filed February 13, 2007 as all of those arguments are equally applicable herein.

In order to establish a *prima facie* case of obviousness, the Office must establish three criteria: (1) a suggestion or motivation to combine the references; (2) a reasonable expectation of success; and (3) the prior art reference (or references when combined) must teach or suggest all of the claim limitations (M.P.E.P. § 2143). M.P.E.P. § 2143.03 prohibits the Office from proposing a modification that renders the prior art unsatisfactory for its intended purpose. Furthermore, the proposed modification cannot change the principle of operation of a reference. It is respectfully submitted that the Office improperly combines Callahan with Sheynblat and Nussbaum, because the proposed modification would render Callahan (the primary reference) unfit for its intended purpose, and the modification would change the principle of operation of Callahan.

Callahan has the objective of providing an efficient, scaleable, easy-to-configure, secure, private way to manage and assure network transactions via analysis of the contents of a data stream between a client and server [0019]. Callahan distinguishes itself from conventional approaches by having clients no longer interact directly with the enterprise application 302 because it uses a semantic firewall 312 to transform client requests into an appropriate role and level of access for the client [0052]. Callahan accomplishes this by using an annotated XML schema used to define a syntax for XML content. Moreover, in the

semantic firewall 312, content is aggregated from a variety of sources and then in a first stage 510, the semantic firewall annotates the XML with new attributes using annotated XML schema 512. In the second stage 514, the semantic firewall filters the output of the first stage based on the attributes added during annotation [0061]. The fields in the annotated file are filtered when the style sheet removes or hides the fields that the user or client should not see. The filtered file is then passed to the third stage of rendering in block 710 [0066]. As an example, in the first stage of annotating, the semantic firewall accepts patient record collection shown in Figure 9 as input and applies rule-based transformations to produce the file shown in Figure 10. In the illustrated example, the rule is: a physician who is not the patient's own physician (e.g., another doctor at the hospital) is allowed to view billing address information and edit the follow-up visit date and time ..." [0071]. The rules themselves can be maintained and changed via an HTML form page such as that shown in Figure 12. As a consequence, "the rule setter, for example a manager or a system administrator, can alter parameters of the rule logic 1208. ... In this manner, a set of rules for a semantic firewall can be configured and managed by non-programmers without service interruption. The rule maintenance page itself can be automatically generated by the system or written by the rule author" [0073].

Thus, as shown in the cover figure in <u>Callahan</u>, stage 1, annotation 510, as shown in the cover figure, is the mechanism by which the XML schema are animated with semantic actions that guide the transformation process [0065]. The application of the annotated XML scheme changes the XML file 504, 506 or 508 to an annotated, intermediate file containing more attributes in block 610 (note that Figure 6 contains block 610, which itself is part of the process performed in step 510 of Figure 5). It is this annotation process and creation of an intermediate file that allows <u>Callahan</u> to achieve its stated objection of providing an efficient and easy-to-configure network transaction. Moreover, without this intermediate step,

Callahan would not be able to allow the "rule setter" to set new rules, thereby accomplishing

the stated goal of providing an efficient, scaleable, easy-to-configure, secure, private way to

manage and assure network transactions via analysis of the contents of a data stream between

a client and server

Each of the independent claims requires a conversion without an intermediate

conversion of the structured documents. The outstanding Office Action attempts to modify

the teachings of Callahan with that of Nussbaum to indicate that the process in Callahan

could be performed in a single step, without the intermediate conversion of the structured

documents. However, such a modification would render Callahan unfit for its intended

purpose and change the principle operation of Callahan. Consequently, it is respectfully

submitted that this proposed modification to Callahan violates M.P.E.P. § 2143.01 and thus,

the Office Action fails to make a *prima facie* case of obviousness with regard to rejected

Claims 1-9.

The above discussion is equally application to claims 2-9.

Furthermore, for the reasons discussed above with regard to Claims 10-33, and in

light of the fact that they depend from their respective independent claims as discussed

above, it is believed that Claims 10-33 also patentably define over the asserted prior art.

Consequently, it is respectfully submitted that the invention defined by Claims 1-33

patentably distinguishes over the prior art. The present application is therefore believed to be

in condition for formal allowance and an early and favorable reconsideration of this

application is therefore requested.

Respectfully submitted,

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